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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE GORDON THOMPSON, JR.)

UNITED STATES OF AMERICA,	)	Case No.08CR1613-GT
Plaintiff,	)	DATE: July 22, 2008 TIME: 9:00 a.m.
v.	)	
MARISA PARIAS-PADILLA,	)	NOTICE OF MOTIONS AND MOTIONS TO: (1) COMPEL DISCOVERY AND PRESERVE EVIDENCE; and (2) GRANT LEAVE TO FILE FURTHER MOTIONS
Defendant.	)	

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND
CALEB MASON, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on July 22, 2008 at 9:00 a.m. or as soon thereafter as counsel may be heard, Defendant, Marisa Parias-Padilla, by and through his attorneys, Bridget Kennedy, and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

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MOTIONS

Defendant, Marisa Parias-Padilla, by and through counsel, BRIDGET KENNEDY, and Federal Defenders of San Diego, Inc., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

(1) Compel Discovery and Preserve Evidence;
(2) Grant Leave to File Further Motions

This motion is based upon the instant motion and notice of motion, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

s/ Bridget Kennedy

Dated: June 25, 2008

BRIDGET KENNEDY
Federal Defenders of San Diego, Inc.
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Attorneys for Ms. Parias-Padilla